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March 22, 2013

via ELECTRONIC FILING

Judge Leonard D. Wexler
United States District Court Judge
Eastern District of New York
Long Island Federal Courthouse
944 Federal Plaza
Central Islip, New York 11722

Re: Callahan v. Suffolk County, et al.
12-CV-02973 (LDW)(GRB)

Dear Judge Wexler:

I represent Plaintiffs in the above- referenced case pending before Your Honor. I am writing on behalf of all parties, as a joint request for a ninety (90) day extension of the April 16, 2013 discovery deadline.

This is the first request for an extension of the discovery deadline. I can represent to the court that the parties are in constant contact and are actively involved in efforts to diligently conclude discovery in a timely fashion. A great deal if not all documentary discovery has been exchanged and we have begun to take depositions of the many named defendants. Notwithstanding these efforts, this request is necessitated by the untimely illness of one of my expert witnesses; he was diagnosed with lung cancer. Although, he thought he could continue to work on this case, I have now realized that unfortunately he will not be able to meet the deadlines as he and I had hoped he would be able to do.

This case involves a shooting in Plaintiffs' home which resulted in the death of Plaintiffs' decedent. The complaint also alleges false arrest as to Plaintiffs Kevin and Patricia Callahan.

Due to the complexity of investigating a police shooting and of investigating a death, the numerous witnesses and reports involved as well as the separate investigation of the false arrest claims, which involve different witnesses, a separate location, and different police

